

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

TIMOTHY MAPES

No. 21 CR 345

Judge John Z. Lee

JOINT STATUS REPORT

The UNITED STATES OF AMERICA, by its attorney, JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, and attorneys Andrew Porter, Kathleen Hill, and Sarah Bakker, on behalf of defendant Timothy Mapes, jointly file this status report pursuant to the Court's July 22, 2021 order (Dkt. 22). The parties state as follows:

1. The indictment in this case charges defendant with perjury, in violation of Title 18, United States Code, Section 1623(a), and attempted obstruction of justice, in violation of Title 18, United States Code, Section 1512(c)(2). Dkt. 1.

2. On or about June 8 and August 24, 2021, the government produced discovery to defense counsel. The discovery in this matter is voluminous, consisting of intercepted communications, line sheets related to those intercepted communications, FBI records, documents produced pursuant to grand jury subpoenas, among other items. The government has produced well in excess of 90,000 documents to date, in addition to over 8,000 recordings and other records, and the government anticipates making supplemental productions on a rolling basis.

3. Defendant has begun reviewing the voluminous discovery and will continue to do so diligently.

4. There are no pending motions, and defendant needs more time to review the discovery recently received to determine the need to meet and confer with the government about discovery and/or to file discovery motions and other potential motions.

5. The parties have not engaged in plea negotiations to date.

6. Owing to counsel's need to review the voluminous discovery in this matter, the parties propose that the Court schedule a status hearing in December. The parties agree that such hearing may be conducted telephonically or by videoconference, if that is the Court's preference.

7. The parties agree that the time until such status hearing should be excluded under Title 18, United States Code, Section 3161(h)(7)(A), to allow defendant and his counsel to review discovery, and because the ends of justice by excluding time outweigh the interest of the public and the defendant in a speedy trial.

Respectfully submitted.

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Dated: September 23, 2021